



State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JON S. CORZINE
Governor

LISA P. JACKSON
Commissioner

Christopher Anderson
Director Environmental Affairs
L.E. Carpenter and Company
33587 Walker Road
Avon Lake, OH 44012

JUN 14 2006

Re: L.E. Carpenter Superfund Site
Wharton Borough, Morris County, New Jersey

The New Jersey Department of Environmental (NJDEP or Department) and the United States Environmental Protection Agency (USEPA) have completed a review of the Remedial Action Report (RAR) dated November 18, 2005. This document was prepared by RMT, Inc. on behalf of L.E. Carpenter and Company (LE). The document was found to be conditionally acceptable provided the following comments are adequately addressed.

General Comment (USEPA):

LE should note that there should be nothing in the RAR that implies or states that MNA has been agreed to as an alternate remedial strategy for groundwater contamination for this site, either in the remediated area, nor in the MW-19 area. It should also be noted that the contaminant concentrations remaining in the MW-19 area remain high. To date, it is also not known what the "residual" concentrations are in the remediated areas. The USEPA has only agreed to consider and evaluate the feasibility or possibility of MNA as an alternative at this site, and this must be based on an acceptable monitoring well network being installed and the proper rounds of groundwater monitoring and sampling for all MNA parameters. LE should be aware that the USEPA may or may not accept MNA as an alternative for this site.

Specific Comments (NJDEP):

Section 6.6, Rockaway River and Drainage Ditch, page 6-4: The RAR states that maintenance activities at the seep area discharge points along the drainage ditch and Rockaway river were terminated and all booms and sweeps were removed. Clarification is needed as to when the seep or observed discharge disappeared and whether or not the disappearance was the result of the completed source remediation. The NJDEP still has concerns about these areas. LE must confirm the status of the discharges and provide a discussion of what action will be taken if contaminant levels in surface water persist. Surface water sampling at the discharge points shall be added to the post remedial quarterly monitoring and sampled quarterly thereafter.

Smear Zone Excavation and Management page 8-9: A map or diagram that clearly shows the final plane view or horizontal extent of the subsurface slurry monolith must be provided. The area that encompasses the monolith material must be documented so that future use of the site leaves the subsurface material undisturbed.

Section 8.10.2, Smear Zone Slurry Excavation, page 8-10: The Report states that the slurry was self hardening and achieved high strength and low permeability over a period of days. There is no data provided in the report to substantiate the above. LE should provide testing results of the final cured material as well as leaching data if contaminants were stabilized within the monolith.

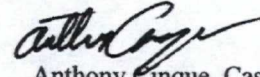
Smear Zone: LE was required to excavate contaminated soil, waste and product to the level of the lowest recorded ground water elevation. It appears that this requirement was not satisfied. Accordingly, ground water remediation may be compromised and require additional time to achieve the cleanup standards. Implementation of additional ground water remedial technologies may be required to achieve this goal.

281829



Should you have any questions please contact me at (609) 633-1416.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anthony Cinque', written in a cursive style.

Anthony Cinque, Case Manager
Bureau of Case Management

C: Jon Rheinhardt, Administrator/CFO, Borough of Wharton
Nicholas Clevett, RMT, Inc.
Steve Cipot, USEPA
George Blyskun, BGWPA
John Prendergast, BEERA

State of New Jersey
Department of Environmental Protection
Division of Remediation Management and Response
PO Box 028
Trenton, NJ 08625-0028



Hasler

012H16208930

\$00.39⁰

06/15/2006

Mailed From 08608

US POSTAGE

Steve Cipot
USEPA - Region II
290 Broadway, 19th Floor
New York, NY 10007-1866

10007+1823 C014

